

EPA Reg. No. 42750-123
Vol. 1

DATA PACKAGE BEAN SHEET

Date: 26-Jan-2006

Page 1 of 2

Decision #: 359509

DP #: (325862)

*** Registration Information ***

Registration: **42750-REG - TRICLOPYR TGA**

Company: 42750 - ALBAUGH INC

Risk Manager: RM 25 - James Tompkins - (703) 305-5697 Room# CM-2 241

Risk Manager Reviewer: Tobi Colvin-Snyder TSNYDER

Sent Date: _____

Calculated Due Date: 22-Apr-2006

Edited Due Date: _____

Type of Registration: Product Registration - Section 3

Action Desc: (R31) NEW PRODUCT;NON-FAST TRACK (INCLUDES REVIEWS OF PRODUCT CHEMIST

Ingredients: 116001, Triclopyr(98%)

*** Data Package Information ***

Expedite: ☐ Yes ☒ No

Date Sent: 26-Jan-2006

Due Back: _____

DP Ingredient: 116001, Triclopyr

DP Title: Acute Toxicity Similarity Determination

CSF Included: ☒ Yes ☐ No

Label Included: ☒ Yes ☐ No

Parent DP #: _____

Assigned To

Date In

Date Out

Organization: RD / TRB

Last Possible Science Due Date: 23-Mar-2006

Team Name: _____

Science Due Date: _____

Reviewer Name: _____

Sub Data Package Due Date: _____

Contractor Name: _____

*** Studies Sent for Review ***

No Studies

*** Additional Data Package for this Decision ***

Printed on Page 2

*** Data Package Instructions ***

The registrant claims that this product is substantially similar to 62719-533 (formerly 51036-386). Please review the label and csf for this product and the cited product, and the acute toxicology review for the cited product, and let me know if this product is substantially similar to the cited product. Let me know if you need additional information.

Thanks.

Tobi

DP#: (325862)

*** Additional Data Package for this Decision ***

Decision#: (359509)

DP #	Division/Branch	Date Sent	Date Due	Instructions*		CSF		Label	
325861	RD / TRB	26-Jan-2006	23-Mar-2006	<input type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> Yes	<input type="radio"/> No
325861	RD / HB	26-Jan-2006	23-Mar-2006	<input type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> Yes	<input type="radio"/> No

DATA PACKAGE BEAN SHEET

Date: 26-Jan-2006

Page 1 of 2

Decision #: 359509

DP #: (325861)

*** Registration Information ***

Registration: **42750-REG - TRICLOPYR TGAI**

Company: 42750 - ALBAUGH INC

Risk Manager: RM 25 - James Tompkins - (703) 305-5697 Room# CM-2 241

Risk Manager Reviewer: Tobi Colvin-Snyder TSNYDER

Sent Date: _____

Calculated Due Date: 22-Apr-2006

Edited Due Date: _____

Type of Registration: Product Registration - Section 3

Action Desc: (R31) NEW PRODUCT;NON-FAST TRACK (INCLUDES REVIEWS OF PRODUCT CHEMIST

Ingredients: 118001, Triclopyr(98%)

*** Data Package Information ***

Expedite: ☐ Yes ☒ No

Date Sent: 26-Jan-2006

Due Back: _____

DP Ingredient: 118001, Triclopyr

DP Title: Product Chemistry Data

CSF Included: ☐ Yes ☒ No

Label Included: ☒ Yes ☐ No

Parent DP #: _____

Assigned To

Date In

Date Out

Organization: RD / TRB

Last Possible Science Due Date: 23-Mar-2006

Team Name: _____

Science Due Date: _____

Reviewer Name: _____

Sub Data Package Due Date: _____

Contractor Name: _____

*** Studies Sent for Review ***

Printed on Page 2

*** Additional Data Package for this Decision ***

No Additional Data Packages

*** Data Package Instructions ***

Please review the attached studies (MRIDs 46619501-06), label and csf, and let me know if they satisfy requirements for registration of this product. Let me know if you need additional information.

Thanks.

Tobi

MRID	Citation Reference	Guideline
46619501	Moyer, J. (2005) Triclopyr TGA: Summary of OPPTS 830.1000 Series Product Properties Test Guidelines. Project Number: ALB2005/15, 16982, 16983. Unpublished study prepared by Albaugh, Inc. 7 p.	830.6302/Color
46619501	Moyer, J. (2005) Triclopyr TGA: Summary of OPPTS 830.1000 Series Product Properties Test Guidelines. Project Number: ALB2005/15, 16982, 16983. Unpublished study prepared by Albaugh, Inc. 7 p.	830.6303/Physical state
46619501	Moyer, J. (2005) Triclopyr TGA: Summary of OPPTS 830.1000 Series Product Properties Test Guidelines. Project Number: ALB2005/15, 16982, 16983. Unpublished study prepared by Albaugh, Inc. 7 p.	830.6304/Odor
46619501	Moyer, J. (2005) Triclopyr TGA: Summary of OPPTS 830.1000 Series Product Properties Test Guidelines. Project Number: ALB2005/15, 16982, 16983. Unpublished study prepared by Albaugh, Inc. 7 p.	830.6313/Stability to sunlight, nor
46619501	Moyer, J. (2005) Triclopyr TGA: Summary of OPPTS 830.1000 Series Product Properties Test Guidelines. Project Number: ALB2005/15, 16982, 16983. Unpublished study prepared by Albaugh, Inc. 7 p.	830.7000/pH of water solutions or
46619501	Moyer, J. (2005) Triclopyr TGA: Summary of OPPTS 830.1000 Series Product Properties Test Guidelines. Project Number: ALB2005/15, 16982, 16983. Unpublished study prepared by Albaugh, Inc. 7 p.	830.7050/UV/Visible absorption
46619501	Moyer, J. (2005) Triclopyr TGA: Summary of OPPTS 830.1000 Series Product Properties Test Guidelines. Project Number: ALB2005/15, 16982, 16983. Unpublished study prepared by Albaugh, Inc. 7 p.	830.7200/Melting point/melting ra
46619501	Moyer, J. (2005) Triclopyr TGA: Summary of OPPTS 830.1000 Series Product Properties Test Guidelines. Project Number: ALB2005/15, 16982, 16983. Unpublished study prepared by Albaugh, Inc. 7 p.	830.7220/Boiling point/boiling ran
46619501	Moyer, J. (2005) Triclopyr TGA: Summary of OPPTS 830.1000 Series Product Properties Test Guidelines. Project Number: ALB2005/15, 16982, 16983. Unpublished study prepared by Albaugh, Inc. 7 p.	830.7300/Density/relative density
46619501	Moyer, J. (2005) Triclopyr TGA: Summary of OPPTS 830.1000 Series Product Properties Test Guidelines. Project Number: ALB2005/15, 16982, 16983. Unpublished study prepared by Albaugh, Inc. 7 p.	830.7370/Dissociation constant in
46619501	Moyer, J. (2005) Triclopyr TGA: Summary of OPPTS 830.1000 Series Product Properties Test Guidelines. Project Number: ALB2005/15, 16982, 16983. Unpublished study prepared by Albaugh, Inc. 7 p.	830.7550/Partition coefficient (n-o
46619501	Moyer, J. (2005) Triclopyr TGA: Summary of OPPTS 830.1000 Series Product Properties Test Guidelines. Project Number: ALB2005/15, 16982, 16983. Unpublished study prepared by Albaugh, Inc. 7 p.	830.7560/Partition coefficient (n-o
46619501	Moyer, J. (2005) Triclopyr TGA: Summary of OPPTS 830.1000 Series Product Properties Test Guidelines. Project Number: ALB2005/15, 16982, 16983. Unpublished study prepared by Albaugh, Inc. 7 p.	830.7570/Partition coefficient (n-o
46619501	Moyer, J. (2005) Triclopyr TGA: Summary of OPPTS 830.1000 Series Product Properties Test Guidelines. Project Number: ALB2005/15, 16982, 16983. Unpublished study prepared by Albaugh, Inc. 7 p.	830.7840/Water solubility: Colum
46619501	Moyer, J. (2005) Triclopyr TGA: Summary of OPPTS 830.1000 Series Product Properties Test Guidelines. Project Number: ALB2005/15, 16982, 16983. Unpublished study prepared by Albaugh, Inc. 7 p.	830.7860/Water solubility, genera
46619501	Moyer, J. (2005) Triclopyr TGA: Summary of OPPTS 830.1000 Series Product Properties Test Guidelines. Project Number: ALB2005/15, 16982, 16983. Unpublished study prepared by Albaugh, Inc. 7 p.	830.7950/Vapor pressure
46619502	Thomson, M. (2005) Preliminary Analysis: Triclopyr TGA. Project Number: 16982, P809MS. Unpublished study prepared by Product Safety Laboratories. 78 p.	830.1700/Preliminary analysis
46619502	Thomson, M. (2005) Preliminary Analysis: Triclopyr TGA. Project Number: 16982, P809MS. Unpublished study prepared by Product Safety Laboratories. 78 p.	830.1800/Enforcement analytical
46619503	Moyer, J. (2005) OPPTS Product Properties Guidelines: Product Identity and Composition, Description of Materials Used to Produce the Product, Description of Production Process, Discussion of Formation of Impurities, and Certified Limits for Triclopyr TGA. Project Number: ALB2005/15. Unpublished study prepared by Albaugh, Inc. 59 p.	830.1550/Product Identity and co
46619503	Moyer, J. (2005) OPPTS Product Properties Guidelines: Product Identity and Composition, Description of Materials Used to Produce the Product, Description of Production Process, Discussion of Formation of Impurities, and Certified Limits for Triclopyr TGA. Project Number: ALB2005/15. Unpublished study prepared by Albaugh, Inc. 59 p.	830.1600/Description of materials
46619503	Moyer, J. (2005) OPPTS Product Properties Guidelines: Product Identity and Composition, Description of Materials Used to Produce the Product, Description of Production Process, Discussion of Formation of Impurities, and Certified Limits for Triclopyr TGA. Project Number: ALB2005/15. Unpublished study prepared by Albaugh, Inc. 59 p.	830.1620/Description of productio
46619503	Moyer, J. (2005) OPPTS Product Properties Guidelines: Product Identity and Composition, Description of Materials Used to Produce the Product, Description of Production Process, Discussion of Formation of Impurities, and Certified Limits for Triclopyr TGA. Project Number: ALB2005/15. Unpublished study prepared by Albaugh, Inc. 59 p.	830.1670/Discussion of formation

MRID	Citation Reference	Guidelines
46619503	Moyer, J. (2005) OPPTS Product Properties Guidelines: Product Identity and Composition, Description of Materials Used to Produce the Product, Description of Production Process, Discussion of Formation of Impurities, and Certified Limits for Triclopyr TGA. Project Number: ALB2005/15. Unpublished study prepared by Albaugh, Inc. 59 p.	830.1750/Certified limits
46619504	Wo, C. (2005) Physical and Chemical Characteristics: Color, Physical State, Odor, Stability, pH, UV/Visible Spectrum, Melting Point, Dissociation Constant, Solubility, and Bulk Density: Triclopyr TGA. Project Number: 16983, P804/AI. Unpublished study prepared by Product Safety Laboratories. 66 p.	830.6302/Color
46619504	Wo, C. (2005) Physical and Chemical Characteristics: Color, Physical State, Odor, Stability, pH, UV/Visible Spectrum, Melting Point, Dissociation Constant, Solubility, and Bulk Density: Triclopyr TGA. Project Number: 16983, P804/AI. Unpublished study prepared by Product Safety Laboratories. 66 p.	830.6303/Physical state
46619504	Wo, C. (2005) Physical and Chemical Characteristics: Color, Physical State, Odor, Stability, pH, UV/Visible Spectrum, Melting Point, Dissociation Constant, Solubility, and Bulk Density: Triclopyr TGA. Project Number: 16983, P804/AI. Unpublished study prepared by Product Safety Laboratories. 66 p.	830.6304/Odor
46619504	Wo, C. (2005) Physical and Chemical Characteristics: Color, Physical State, Odor, Stability, pH, UV/Visible Spectrum, Melting Point, Dissociation Constant, Solubility, and Bulk Density: Triclopyr TGA. Project Number: 16983, P804/AI. Unpublished study prepared by Product Safety Laboratories. 66 p.	830.6313/Stability to sunlight, nor
46619504	Wo, C. (2005) Physical and Chemical Characteristics: Color, Physical State, Odor, Stability, pH, UV/Visible Spectrum, Melting Point, Dissociation Constant, Solubility, and Bulk Density: Triclopyr TGA. Project Number: 16983, P804/AI. Unpublished study prepared by Product Safety Laboratories. 66 p.	830.7000/pH of water solutions or
46619504	Wo, C. (2005) Physical and Chemical Characteristics: Color, Physical State, Odor, Stability, pH, UV/Visible Spectrum, Melting Point, Dissociation Constant, Solubility, and Bulk Density: Triclopyr TGA. Project Number: 16983, P804/AI. Unpublished study prepared by Product Safety Laboratories. 66 p.	830.7050/UV/Visible absorption
46619504	Wo, C. (2005) Physical and Chemical Characteristics: Color, Physical State, Odor, Stability, pH, UV/Visible Spectrum, Melting Point, Dissociation Constant, Solubility, and Bulk Density: Triclopyr TGA. Project Number: 16983, P804/AI. Unpublished study prepared by Product Safety Laboratories. 66 p.	830.7200/Melting point/melting ra
46619504	Wo, C. (2005) Physical and Chemical Characteristics: Color, Physical State, Odor, Stability, pH, UV/Visible Spectrum, Melting Point, Dissociation Constant, Solubility, and Bulk Density: Triclopyr TGA. Project Number: 16983, P804/AI. Unpublished study prepared by Product Safety Laboratories. 66 p.	830.7300/Density/relative density
46619504	Wo, C. (2005) Physical and Chemical Characteristics: Color, Physical State, Odor, Stability, pH, UV/Visible Spectrum, Melting Point, Dissociation Constant, Solubility, and Bulk Density: Triclopyr TGA. Project Number: 16983, P804/AI. Unpublished study prepared by Product Safety Laboratories. 66 p.	830.7370/Dissociation constant in
46619504	Wo, C. (2005) Physical and Chemical Characteristics: Color, Physical State, Odor, Stability, pH, UV/Visible Spectrum, Melting Point, Dissociation Constant, Solubility, and Bulk Density: Triclopyr TGA. Project Number: 16983, P804/AI. Unpublished study prepared by Product Safety Laboratories. 66 p.	830.7840/Water solubility: Colum
46619505	Tremain, S. (2005) Triclopyr TGA: Determination of Vapour Pressure. Project Number: 1968/019. Unpublished study prepared by Safepharm Laboratories Ltd. 25 p.	830.7950/Vapor pressure
46619506	Wo, C. (2005) N-Octanol/Water Partition Coefficient - Shake Flask Method: Triclopyr TGA. Project Number: 17025, P808. Unpublished study prepared by Product Safety Laboratories. 18 p.	830.7550/Partition coefficient (n-o



U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs
Registration Division (H7505C)
401 "M" St., S.W.
Washington, D.C. 20460

EPA Reg.
Number:

42750-
123

Date of Issuance:

APR 6 2006
APR 6 2006

NOTICE OF PESTICIDE:

 x Registration
 Reregistration

(under FIFRA, as amended)

Term of Issuance:

Conditional

Name of Pesticide Product:

Triclopyr TGAI

Name and Address of Registrant (include ZIP Code):

Mr. Morris Gaskins
Albaugh Inc.
Ankeny, IA 50021

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA sec. 3(c)(7)(A) provided that you:

1. Submit and/or cite all data required for registration/reregistration of your product when the Agency requires all registrants of similar products to submit such data.
2. Make the following changes to your labeling:
 - a. Change the registration number to "42750-123"
 - b. In the Precautionary Statements section, after "... and handling" add "and before eating, drinking, chewing gum, or using tobacco. Wear long-sleeved shirt and long pants, protective eyewear, socks, shoes, and gloves."
3. Submit final labeling for this product **within 30 days** of the date of this letter

Signature of Approving Official:

Date:

4-6-06

page 2

EPA Reg. No.42750-123

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records.

If you have any questions about this letter, please contact Tobi Colvin-Snyder at 703-305-7801.

Jim Tompkins
Product Manager (25)
Herbicide Branch
Registration Division (7505C)

TRICLOPYR TGAI
An Herbicide for Manufacturing Use Only

ACTIVE INGREDIENT:	
3,5,6-trichloro-2-pyridyloxyacetic acid	98.0%
INERT INGREDIENTS:	2.0%
TOTAL:	100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID

ACCEPTED
with COMMENTS
in EPA Letter Dated

APR 6 2001

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.

42750-123

IF SWALLOWED:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by the poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or doctor for treatment advice.

IF IN EYES:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
- Call a poison control center or doctor for treatment advice.

EPA Reg. No. 42750-xx

EPA Est. No. XXX-XX-XXX

NET CONTENTS:

Manufactured For:
ALBAUGH, INC.
ANKENY, IA 50021

PRECAUTIONARY STATEMENTS,

Hazards to Humans and Domestic Animals

CAUTION. Harmful if swallowed or absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling. Remove and wash contaminated clothing before reuse.

EMERGENCY NUMBERS: Transportation or spill, call CHEMTREC 800-424-9300.

ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with a National Pollution Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

NOTICE: Read the entire label. Use only according to label directions. Before buying or using this product, read WARRANTY LIMITATIONS AND DISCLAIMER elsewhere on this label.

AGRICULTURAL CHEMICAL - Do not ship or store with food, feeds, drugs or clothing

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

This product may be used to manufacture products that:

1. Contain triclopyr butoxyethyl ester (BEE) for use on rangeland, permanent pastures, forestry, turf, non-irrigation ditches, non-cropland, roadsides, rights-of-ways, fence rows, industrial sites and conservation reserve program (CRP) areas.
2. Contain triclopyr triethanolamine (TEA) for use on rangeland, permanent pastures, forestry, turf, Christmas tree plantations, non-irrigation ditches, non-cropland, roadsides, rights-of-ways, rice, fencerows, industrial sites and conservation reserve program (CRP) areas.
3. Specific uses not listed on the MP label if the formulator, user group or grower has complied with the U.S. EPA submission requirements regarding the support of such uses.

NOTE: Because of their properties and intended uses, formulations containing TRICLOPYR 98% TECHNICAL ACID may require precautionary labeling differing from that given on this label. Formulators should develop their own use and precautionary labeling based on the properties and intended uses of their own formulations and in accordance with all pertinent laws and regulations.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited.

PESTICIDE STORAGE: Store above 28 F away from moisture.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes "cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

GENERAL: Consult Federal, state or local disposal authorities for approved alternative procedures.

WARRANTY LIMITATIONS AND DISCLAIMER

Albaugh, Inc. warrants that at the time of delivery, the good will conform to its chemical description on the label, that they will pass without objection in the trade under the contract description, that they will be reasonably fit for the uses stated on the label when used in accordance with directions, that Seller will convey good title thereto, and that such goods will be delivered free from any lawful security interest, lien or encumbrance.

This is the only warranty made on this product. ALBAUGH, INC. EXPRESSLY DISCLAIMS ANY IMPLIED WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE AND, EXCEPT AS SET FORTH IN THE ABOVE PARAGRAPH, ANY OTHER EXPRESS OR IMPLIED WARRANTIES. Buyer acknowledges the use of its own independent skill and expertise in the selection and use of the goods and does not rely exclusively on any oral or written statements or representations.

TRICLOPYR TGAI
An Herbicide for Manufacturing Use Only

ACTIVE INGREDIENT:

3,5,6-trichloro-2-pyridyloxyacetic acid 98.0%

INERT INGREDIENTS: 2.0%

TOTAL: 100.0%

45.5°
15
10

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID

IF SWALLOWED:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by the poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or doctor for treatment advice.

IF IN EYES:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
- Call a poison control center or doctor for treatment advice.

EPA Reg. No. 42750-xx

EPA Est. No. XXX-XX-XXX

NET CONTENTS:

Manufactured For:
ALBAUGH, INC.
ANKENY, IA 50021

PRECAUTIONARY STATEMENTS,

Hazards to Humans and Domestic Animals

CAUTION. Harmful if swallowed or absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling. Remove and wash contaminated clothing before reuse.

EMERGENCY NUMBERS: Transportation or spill, call CHEMTREC 800-424-9300.

ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with a National Pollution Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

NOTICE: Read the entire label. Use only according to label directions. Before buying or using this product, read WARRANTY LIMITATIONS AND DISCLAIMER elsewhere on this label.

AGRICULTURAL CHEMICAL - Do not ship or store with food, feeds, drugs or clothing

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

This product may be used to manufacture products that:

1. Contain triclopyr butoxyethyl ester (BEE) for use on rangeland, permanent pastures, forestry, turf, non-irrigation ditches, non-cropland, roadsides, rights-of-ways, fence rows, industrial sites and conservation reserve program (CRP) areas.
2. Contain triclopyr triethanolamine (TEA) for use on rangeland, permanent pastures, forestry, turf, Christmas tree plantations, non-irrigation ditches, non-cropland, roadsides, rights-of-ways, rice, fencerows, industrial sites and conservation reserve program (CRP) areas.
3. Specific uses not listed on the MP label if the formulator, user group or grower has complied with the U.S. EPA submission requirements regarding the support of such uses.

NOTE: Because of their properties and intended uses, formulations containing TRICLOPYR 98% TECHNICAL ACID may require precautionary labeling differing from that given on this label. Formulators should develop their own use and precautionary labeling based on the properties and intended uses of their own formulations and in accordance with all pertinent laws and regulations.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited.

PESTICIDE STORAGE: Store above 28 F away from moisture.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes "cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

GENERAL: Consult Federal, state or local disposal authorities for approved alternative procedures.

WARRANTY LIMITATIONS AND DISCLAIMER

Albaugh, Inc. warrants that at the time of delivery, the good will conform to its chemical description on the label, that they will pass without objection in the trade under the contract description, that they will be reasonably fit for the uses stated on the label when used in accordance with directions, that Seller will convey good title thereto, and that such goods will be delivered free from any lawful security interest, lien or encumbrance.

This is the only warranty made on this product. ALBAUGH, INC. EXPRESSLY DISCLAIMS ANY IMPLIED WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE AND, EXCEPT AS SET FORTH IN THE ABOVE PARAGRAPH, ANY OTHER EXPRESS OR IMPLIED WARRANTIES. Buyer acknowledges the use of its own independent skill and expertise in the selection and use of the goods and does not rely exclusively on any oral or written statements or representations.

Find chem review

TRICLOPYR TGAI
An Herbicide for Manufacturing Use Only

ACTIVE INGREDIENT:

3,5,6-trichloro-2-pyridyloxyacetic acid 98.0%

INERT INGREDIENTS: 2.0%

TOTAL: 100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID

IF SWALLOWED:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by the poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or doctor for treatment advice.

IF IN EYES:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
- Call a poison control center or doctor for treatment advice.

EPA Reg. No. 42750-xx

EPA Est. No. XXX-XX-XXX

NET CONTENTS:

Manufactured For:
ALBAUGH, INC.
ANKENY, IA 50021

PRECAUTIONARY STATEMENTS,

Hazards to Humans and Domestic Animals

CAUTION. Harmful if swallowed or absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling. Remove and wash contaminated clothing before reuse.

EMERGENCY NUMBERS: Transportation or spill, call CHEMTREC 800-424-9300.

ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with a National Pollution Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

and before eating, drinking,
chewing gum, or using tobacco,
wear long-sleeved shirt and
long pants, protective eyewear, socks, shoes,
and gloves

NOTICE: Read the entire label. Use only according to label directions. Before buying or using this product, read WARRANTY LIMITATIONS AND DISCLAIMER elsewhere on this label.

AGRICULTURAL CHEMICAL - Do not ship or store with food, feeds, drugs or clothing

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

This product may be used to manufacture products that:

1. Contain triclopyr butoxyethyl ester (BEE) for use on rangeland, permanent pastures, forestry, turf, non-irrigation ditches, non-cropland, roadsides, rights-of-ways, fence rows, industrial sites and conservation reserve program (CRP) areas.
2. Contain triclopyr triethanolamine (TEA) for use on rangeland, permanent pastures, forestry, turf, Christmas tree plantations, non-irrigation ditches, non-cropland, roadsides, rights-of-ways, rice, fencerows, industrial sites and conservation reserve program (CRP) areas.
3. Specific uses not listed on the MP label if the formulator, user group or grower has complied with the U.S. EPA submission requirements regarding the support of such uses.

NOTE: Because of their properties and intended uses, formulations containing TRICLOPYR 98% TECHNICAL ACID may require precautionary labeling differing from that given on this label. Formulators should develop their own use and precautionary labeling based on the properties and intended uses of their own formulations and in accordance with all pertinent laws and regulations.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited.

PESTICIDE STORAGE: Store above 28 F away from moisture.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes "cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

GENERAL: Consult Federal, state or local disposal authorities for approved alternative procedures.

WARRANTY LIMITATIONS AND DISCLAIMER

Albaugh, Inc. warrants that at the time of delivery, the good will conform to its chemical description on the label, that they will pass without objection in the trade under the contract description, that they will be reasonably fit for the uses stated on the label when used in accordance with directions, that Seller will convey good title thereto, and that such goods will be delivered free from any lawful security interest, lien or encumbrance.

This is the only warranty made on this product. ALBAUGH, INC. EXPRESSLY DISCLAIMS ANY IMPLIED WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE AND, EXCEPT AS SET FORTH IN THE ABOVE PARAGRAPH, ANY OTHER EXPRESS OR IMPLIED WARRANTIES. Buyer acknowledges the use of its own independent skill and expertise in the selection and use of the goods and does not rely exclusively on any oral or written statements or representations.

Date: March 23, 2006

FEE

SUBJECT: **FEE**: Triclopyr TGAi

FROM: Debra Rate
Product Chemistry Team
Technical Review Branch/RD (7505C)

Debra H. Rate

8/6/03/23/06.

TO: James Tompkins / Tobi Colvin-Snyder RM 25
Herbicide Branch / RD (7505C)

DECISION NO: 359509
DP BARCODE: 325861
EPA REG. NO.: 42750-REG
PRODUCT: Triclopyr TGAi
PCC: 116001
REGISTRANT: Albaugh Inc.
USE: Herbicide

INTRODUCTION:

The registrant has submitted a Confidential Statement of Formula (CSF) for basic formulation (dated 21/MAR/2005). The basic CSF is for a production facility in [REDACTED]. The registrant has claimed that proposed product is substantially similar to EPA Reg. No. 51036-386. The 830 Series Subgroup A and B data have been submitted under the MRID Nos. 466195-01 through 466195-06. The Technical Review Branch (TRB) has been asked to evaluate the new submission and the similarity with the EPA Reg. No. 51036-386 to determine if the submitted data and studies will support the registration of the subject product.

SUMMARY OF FINDINGS:

1. The manufacturing site where this product is to be produced by Albaugh, Inc. is located at [REDACTED].
[REDACTED] The 5 batch analysis was performed on test substances of the subject product produced by Albaugh, Inc.
2. The registrant has submitted a basic formulation CSF (dated 21/MAR/2005) for Triclopyr TGAi. The nominal concentration (98.50%) of the AI (triclopyr) concurs with the product label claim nominal concentration of 98.50%. The product chemistry data submitted corresponding to guideline reference 830.1550 (product identity & composition) and 830.1750 (certified limits) satisfy the data requirements of 40CFR§158.155 and 158.175, respectively.
3. The subject product is produced in an integrated system through [REDACTED]. The registrant has submitted to the reviewer, the MSDs of the starting materials used in the production of this technical product. The description submitted in MRID No. 466195-03 detailing the production and manufacturing processes corresponding to guidelines 830.1600 and 830.1620 satisfy the requirements for 40CFR§158.160 and 158.162.
4. The registrant has provided an adequate explanation of the impurities that are known to be associated with the subject product and potential impurities of the subject product. One toxic impurity that is present in the TGAi is present below the level of quantitation of this impurity at [REDACTED] and is therefore not listed on the CSF. The identity of this impurity is located in the Confidential Appendix. This submitted data corresponding to guideline 830.1670 (discussion on the formation of impurities) satisfy the data requirements of 40CFR§158.167. The preliminary 5-batch analysis provided by the registrant concurs with the data the registrant presented on the impurities. [MRID Nos. 466195-03]
5. The product chemistry data submitted corresponding to the guideline reference 830.1700 (preliminary analysis) satisfy the data requirements for 40CFR§158.170. The % AI and the impurities were determined for the test substance. See the Confidential Appendix for details. [MRID No. 466195-02]
6. The data submitted corresponding to reference guideline 830.1800 (Enforcement Analytical Method) satisfies the data requirements of 40CFR§158.180. The method of analysis of the active ingredient (AI) is

BARCODE: 325861 **Reg. No.:** 42750-REG **PRODUCT:** Triclopyr TGAI

high-performance liquid chromatography (HPLC) with UV detection (235 nm). A confirmatory method of liquid chromatography coupled with mass spectroscopy (MS) was also utilized. The HPLC method was validated for precision, linearity, and accuracy. See Confidential Appendix for details. [MRID No. 466195-02]

7. The registrant claims that the basic formulation of the subject product is substantially similar to EPA Reg. No. 51036-386. TRB has investigated these claims:

- (a). The % nominal concentration of the active ingredient (triclopyr) of the subject product falls within the certified limits of the cited technical (EPA Reg. No. 51036-386).
- (b). The reported pH values are similar.
- (c). The impurity profile of the subject product introduces a substantial level of a new impurity when compared to the cited product's impurity profile.
- (d). The reported densities of the two products are similar.

TRB has concluded that due to the difference in impurity profiles, the proposed Technical product (Triclopyr Technical) and the cited product (EPA Reg. No. 51036-386) are not substantially similar from a product chemistry point of view.

8. The submitted data corresponding to 830 Series Subgroup B (physical-chemical properties) are acceptable and satisfy the data requirements for 40CFR§158.190.

9. The submitted label for the subject product needs to insert "Triclopyr:" before or above the chemical name listed on the ingredient statement. The chemical / physical hazards and storage and disposal statements are adequate from a product chemistry point of view.

CONCLUSIONS:

TRB has reviewed the product chemistry data and CSF (dated 21/MAR/2005) submitted for Triclopyr TGAI and has concluded that:

- 1. All of the product chemistry data submitted corresponding to 830 Series Subgroup A satisfies the data requirements of 40CFR§158.155.
- 2. The data submitted corresponding to reference guidelines 830 Series Subgroup B data are acceptable and satisfy the data requirements of 40CFR§158.190.
- 3. The CSF for basic formulation (dated 21/MAR/2005) is acceptable.
- 4. The TRB has concluded that from a product chemistry point of view, the subject product is not substantially similar to the EPA Reg. No. 51036-386. See finding # 7.
- 5. The label should be revised as described in Finding #9.
- 6. The registrant must submit samples of the TGAI to the Agency in the amount of ~20 g to the following address:

Ms. Theresa Cole
EPA National Pesticide Standard Repository
Environmental Science Center
701 Mapes Road
Fort Meade, MD 20755-5350

BARCODE: 325861 **Reg. No.:** 42750-REG **PRODUCT:** Triclopyr TGA

Common Name: Triclopyr

Chemical name:

IUPAC: 3,5,6-trichloro-2-pyridyloxyacetic acid

CAS: [(3,5,6-trichloro-2-pyridyl)oxy]acetic acid

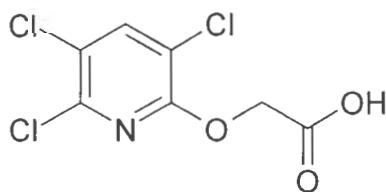
CAS No.: 55335-06-3

PC Code No.: 116001

Empirical formula: $C_7H_4Cl_3NO_3$

Molecular Weight: 256.5

Structural formula:



ATTACHMENT II

REVIEW OF PRODUCT CHEMISTRY, OPPTS 830 SERIES

Chemical Name (IUPAC, CAS)	IUPAC: 3,5,6-trichloro-2-pyridyloxyacetic acid CAS: [(3,5,6-trichloro-2-pyridyl)oxy]acetic acid
Chemical Number (CAS; PC Code)	CAS No. 55335-06-3 PC Code: 116001
Registration/Symbol No.	42750-REG
Type of Product (T, MP, EP)	98.5 %
DP Barcode	325861
Reviewer	Debra Rate
Branch Chief	Deborah McCall

Table 1: Manufacturing and Impurity Data for the Triclopyr TGAI.

GLN	Requirement	MRID	Status ¹	Details and/or Deficiency ²
830.1550	Product Identity & Disclosure of Ingredients	466195-03, CSF (dated 21/MAR/2005)	Y	The nominal concentration of the AI (98.5%) concurs with the product label claim and is supported by the 5 batch analyses to be with in the certified limits.
830.1600 830.1620	Starting Materials & Manufacturing Process	466195-03	Y	The registrant has provided specifications of the starting materials that are used to produce the subject product. The subject product is produced in an integrated system through a [REDACTED]
830.1670	Discussion of Impurities	466195-03	Y	An adequate explanation of the known and potential impurities found in the technical product has been provided. The registrant has not identified any of the impurities to be of toxicological concern to the Agency..
830.1700	Preliminary Analysis	466195-02	Y	The registrant has provided 5 batch analysis for the TGAI.
830.1750	Certification of Limits	466195-03	Y	The registrant based the upper certified limits on the results obtained from the 5 batch analyses, the manufacturing history, and the standards set forth in 40CFR§158.175(b)(2).
830.1800	Analytical Methods	466195-03, CSF (dated 21/MAR/2005)	Y	The method submitted to determine the %AI (triclopyr) was HPLC with UV detection (235 nm) with LCMS confirmation. The methods were validated for accuracy (linearity), precision, and recovery.
830.1900	Submittal of Samples		N	The registrant must submit samples of the TGAI to the Agency at the address listed in the Conclusion section of this report.

¹ A = Acceptable; N = Unacceptable (see Deficiency); U = Upgradable data; N/A = Not Applicable.

Table 2: Physical and Chemical Properties of Triclopyr TGAI.

GLN	Requirement	MRID	Status	Result or Deficiency
-----	-------------	------	--------	----------------------

Manufacturing process information may be entitled to confidential treatment

Table 2: Physical and Chemical Properties of Triclopyr TGAI.

GLN	Requirement	MRID	Status	Result or Deficiency					
830.6302	Color	466195-04	Y	White					
830.6303	Physical state	466195-04	Y	Solid: Powder					
830.6304	Odor	466195-04	Y	Practically odorless					
830.6313	Stability to normal and elevated temperatures, metals, and metal ions	466195-04	Y	Stable at elevated temperature (54°C). Stable when introduced to aluminum powder, aluminum acetate powder, iron powder and ferric acetate powder.					
830.7000	pH	466195-04	Y	pH = 3.22 ± 0.01					
830.7050	UV/Visible Absorption	466195-04	Y	Neutral:		Acidic		Alkaline	
				295.0 nm	232.0 nm	294.0 nm	231.0 nm	297.0 nm	233.0 nm
				$\epsilon=755$ 4.6	$\epsilon=117$ 82.6	$\epsilon=727$ 5.3	$\epsilon=11$ 274.8	$\epsilon=7707$.0	$\epsilon=123$ 28.6
830.7200	Melting point	466195-04	Y	151°C					
830.7220	Boiling point		NA						
830.7300	Relative Density	466195-04	Y	Tap: 0.483 ± 0.002 g/ml Pour: 0.254 ± 0.004 g/ml					
830.7370	Dissociation constants in water	466195-04	Y	3.442 ± 0.020					
830.7550	Partition coefficient	466195-06	Y	Log P_{ow} = 0.807					
830.7840	Water solubility:	466195-04	Y	0.38 ± 0.01					
830.7950	Vapor pressure	466195-05	Y	3.2×10^{-5} Pa					

BARCODE: 325861 **Reg. No.:** 42750-REG **PRODUCT:** Triclopyr TGA1

830.1800. Enforcement analytical method: [MIRD No. 466195-02]

The methods used to determine the %AI, Triclopyr, are HPLC with UV detection (235 nm) with confirmatory LCMS.

Operating Conditions for the analysis of Triclopyr:

Reagents:

Acetonitrile (ACN), HPLC grade

Methanol, HPLC grade

Water, HPLC grade

Acetic Acid, reagent grade

Ammonium hydroxide, reagent grade

HPLC:

System: Thermo Surveyor

Columns: 3-Agilent Zorbax Eclipse XDB-C8, Narrow Bore, 3.5 μ m, 2.1 X 150 mm

Column Temperature: 40°C

Mobile Phase: Methanol with 0.1% Acetic Acid / Water with 0.5% Acetic Acid (pH 5.0) / Acetonitrile (60 : 35 : 5)

Flow Rate: 175 μ l / min

Injection Volume: 5 μ l

Detector: UV

Wavelength: 235 nm

Bandwidth: 9 nm

Run Time: 12 min

Retention Time: ~ 9.6 min

LCMS:

System: Thermo Advantage LCQ

Column: 3-Agilent Zorbax Eclipse XDB-C8, Narrow Bore, 3.5 μ m, 2.1 X 150 mm

Column Temperature: 40°C

Mobile Phase: Methanol with 0.1% Acetic Acid / Water with 0.5% Acetic Acid (pH 5.0) / Acetonitrile (60 : 35 : 5)

Flow Rate: 175 μ l / min

Injection Volume: 5 μ l

Detector: MS

Ionization Mode: Electrospray, Negative Ion

Mass Range: 100 – 600 daltons

Run Time: 15 min

Manufacturing process information may be entitled to confidential treatment

CONFIDENTIAL APPENDIX:

BARCODE: 325861 **Reg. No.:** 42750-REG **PRODUCT:** Triclopyr TGA

830.1600. Description of Materials used to produce the product: [Submitted to Reviewer, also attached to pdf file in database]

The registrant has submitted MSDSs of the starting materials that will be used to manufacture the TGA at the facility [REDACTED] This fulfills the data requirements of 830.1600 and 40CFR§158.160.

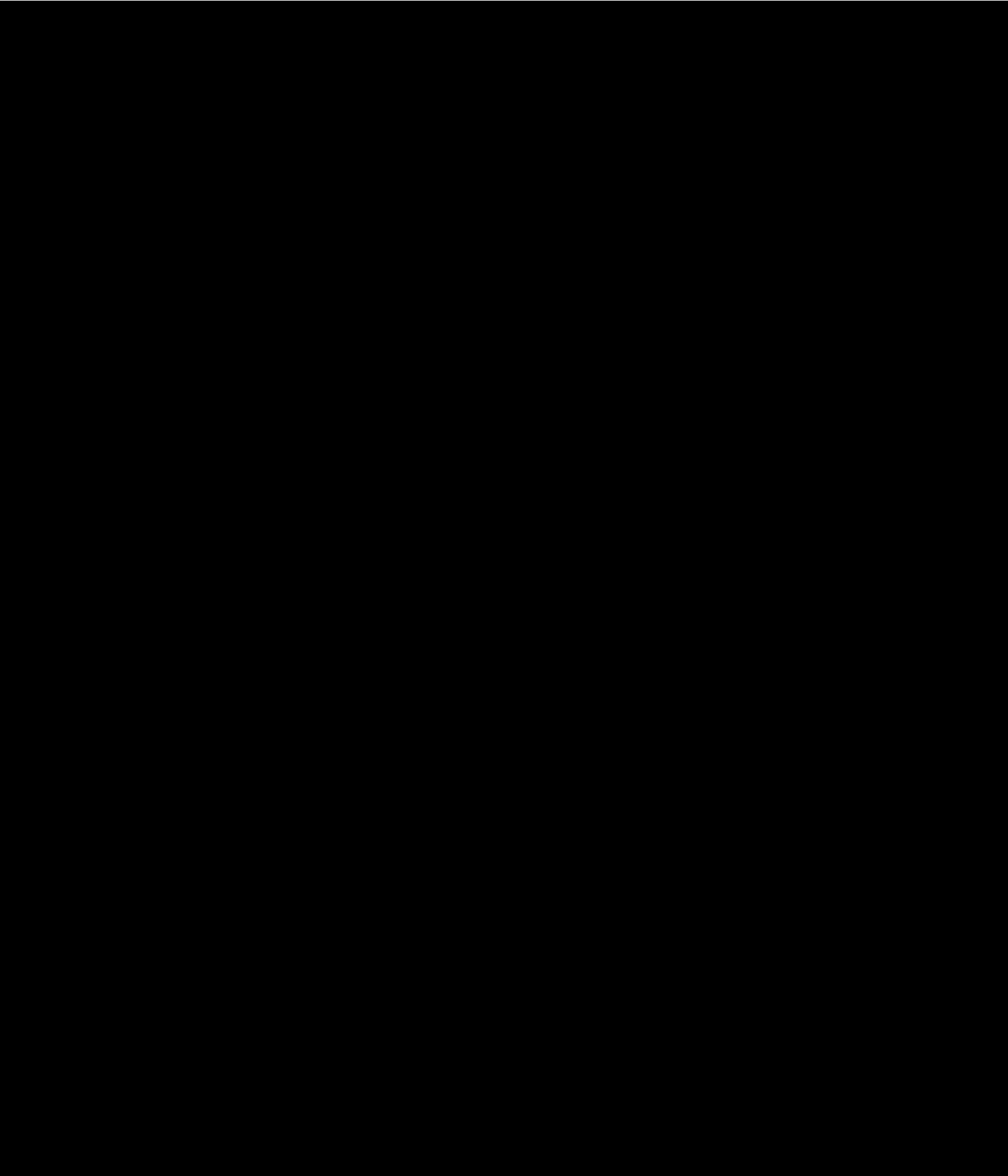
830.1620. Description of production process: [MRID No. 466195-03]



Manufacturing process information may be entitled to confidential treatment

CONFIDENTIAL APPENDIX:

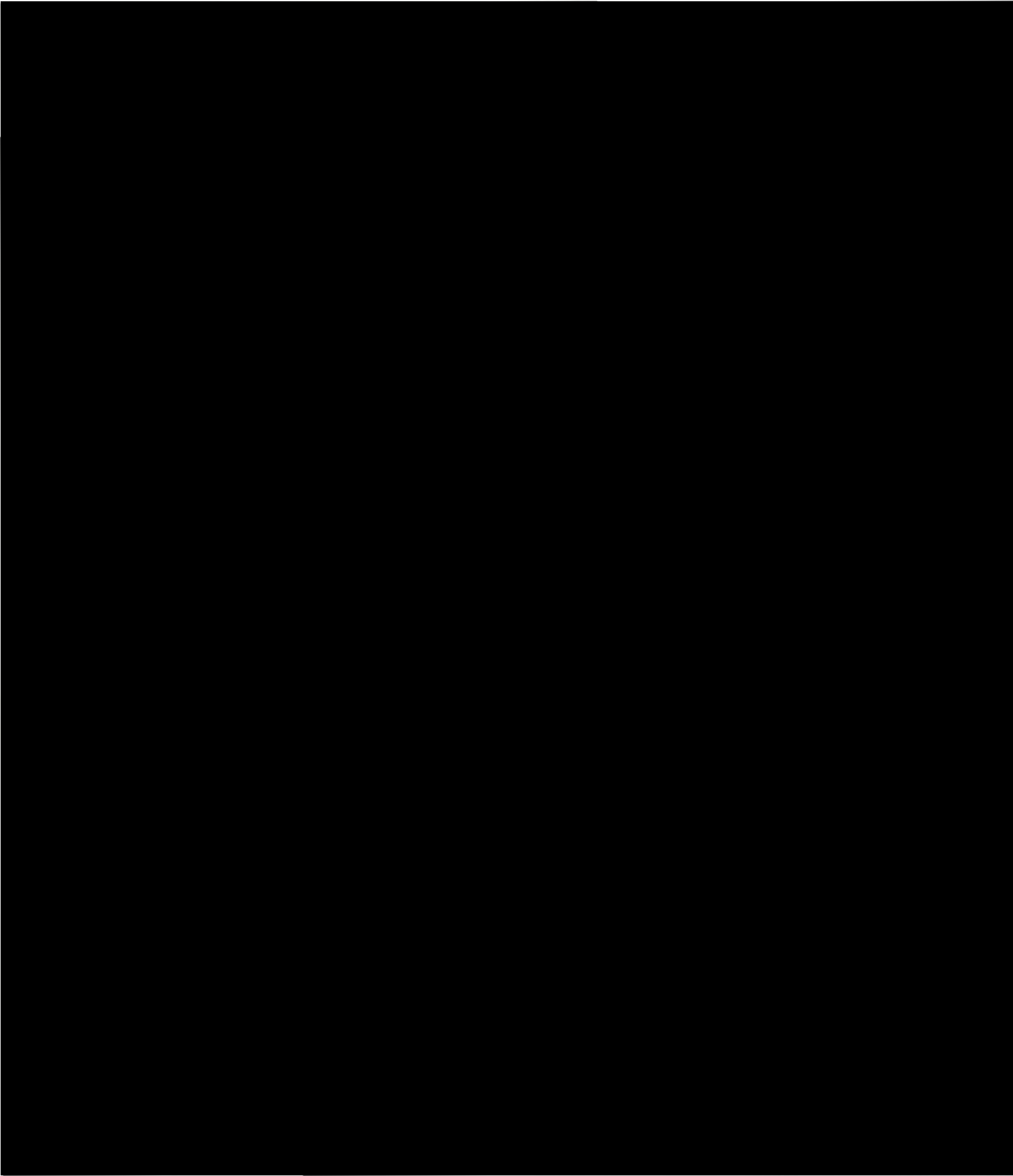
BARCODE: 325861 **Reg. No.:** 42750-REG **PRODUCT:** Triclopyr TGA



Manufacturing process information may be entitled to confidential treatment

CONFIDENTIAL APPENDIX:

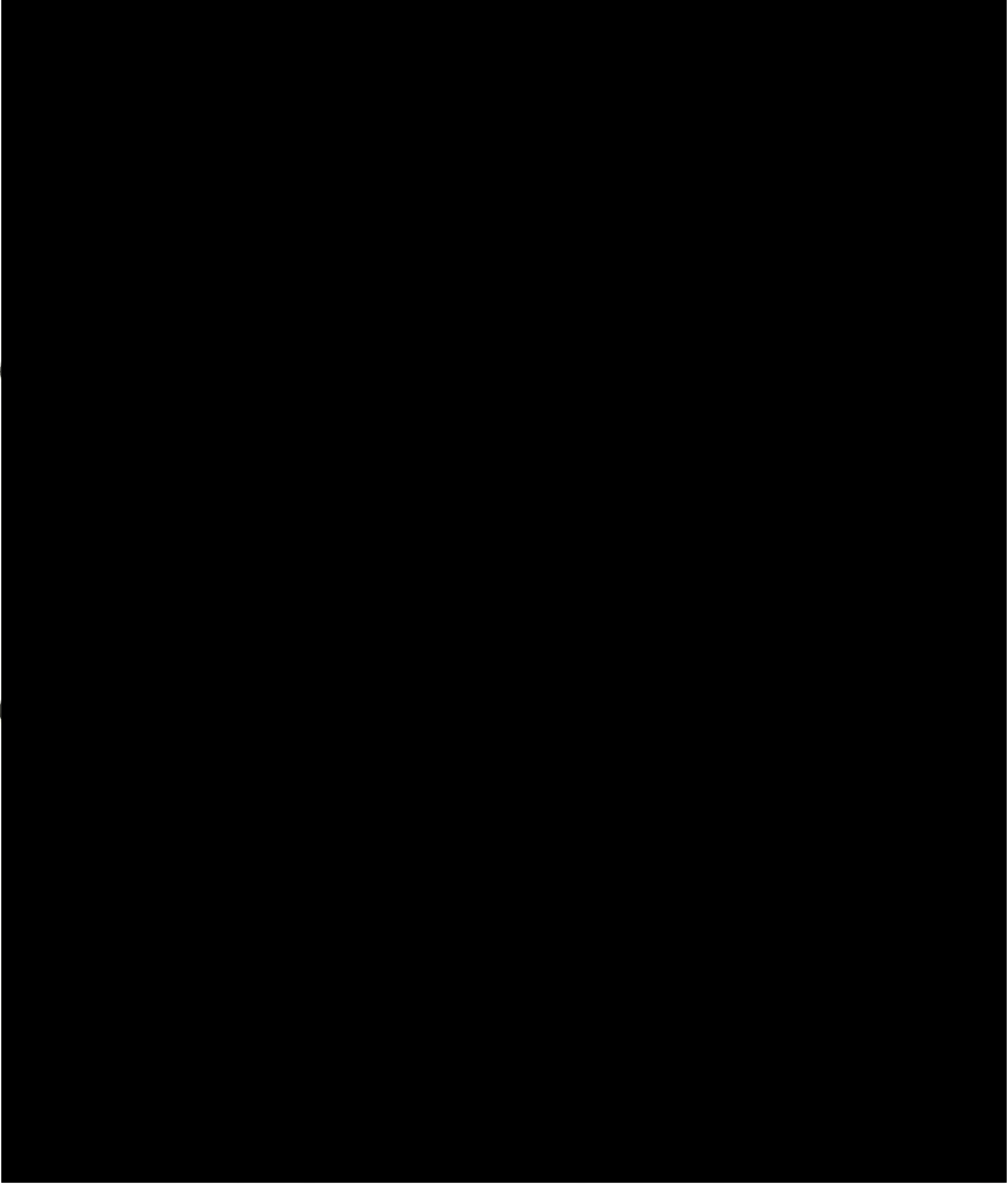
BARCODE: 325861 Reg. No.: 42750-REG PRODUCT: Triclopyr TGA



Manufacturing process information may be entitled to confidential treatment

CONFIDENTIAL APPENDIX:

BARCODE: 325861 Reg. No.: 42750-REG PRODUCT: Triclopyr TGA



Manufacturing process information may be entitled to confidential treatment

CONFIDENTIAL APPENDIX:

BARCODE: 325861 Reg. No.: 42750-REG PRODUCT: Triclopyr TGA



Manufacturing process information may be entitled to confidential treatment

CONFIDENTIAL APPENDIX:

BARCODE: 325861 Reg. No.: 42750-REG PRODUCT: Triclopyr TGA



Manufacturing process information may be entitled to confidential treatment

CONFIDENTIAL APPENDIX:

BARCODE: 325861 Reg. No.: 42750-REG PRODUCT: Triclopyr TGAi

830.1750. Certified Limits:

Compound/Component			Nominal Concentration (% w/w)	Lower Certified Concentration (% w/w)	Upper Certified Concentration (% w/w)
No.	Name	Type			
	Triclopyr TGAi [(3,5,6-trichloro-2-pyridyl)oxy]acetic acid	AI	98.5	95.55	99.99



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF PREVENTION,
PESTICIDES AND TOXIC SUBSTANCES
Similarity Action

07/FEB/2006

MEMORANDUM

Subject: Name of Pesticide Product: Triclopyr TGA1
EPA Reg. No. /File Symbol: #42750-REG
DP Barcode: 325862
Decision No.: 359509
PC Code: 116001

From: Masih Hashim, Toxicologist *MH*
Technical Review Branch *DMC*
Registration Division (7505C)

To: Tobi Calvin-Snyder, RM Team 25
Herbicide Branch
Registration Division (7505C)

Applicant: Albaugh Inc.
Ankeny, IA 50021

FORMULATION FROM LABEL:

<u>Active Ingredient(s):</u>	<u>by wt. %</u>
Triclopyr	98.0
<u>Inert Ingredients:</u>	<u>2.0</u>
Total:	100.0

ACTION REQUESTED: Similarity action is requested between the Proposed File Symbol #42750-REG and the cited EPA Registered Product #62719-533 (formerly #51036-386).

RECOMMENDATIONS: TRB has evaluated the formulations of the proposed and the cited

products (see above), and found them to be substantially similar. TRB has no objection to bridging data between them.

The Signal Word is CAUTION.

The toxicology profile for the File Symbol #42750-REG is as follows:

acute oral toxicity	III	cited-acceptable	MRID 45451304
acute dermal toxicity	IV	cited-acceptable	MRID 45451305
acute inhalation study	IV	cited-acceptable	MRID 45451306
primary eye irritation	III	cited-acceptable	MRID 45451307
primary dermal irritation	IV	cited-acceptable	MRID 45451308
dermal sensitization	neg.	cited-acceptable	MRID 45451309

PRODUCT ID #: 042750-00123

PRODUCT NAME: Triclopyr TGAI

PRECAUTIONARY STATEMENTS

SIGNAL WORD: CAUTION

Hazards to Humans and Domestic Animals:

Harmful if swallowed. Causes moderate eye irritation. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Avoid contact with eyes or clothing. Wear protective eyewear. Wear: Long-sleeved shirt and long pants, Socks, Shoes, and gloves.

First Aid:

If swallowed:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to by a poison control center or doctor.
- Do not give anything to an unconscious person.

If on Skin or clothing:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or doctor for treatment advice.

If in eyes:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.
- Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

CORPORATE OFFICE

1525 NE 36th Street
Ankeny, IA 50021
515.964.9444 - Office
800.247.8013 - Toll Free
515.964.7813 - Facsimile

ALBAUGH, INC.

Valdosta Office

P.O. Box 2127
304 Janet Street, Suite H
Valdosta, GA 31604
229.244.3288 - Office
229.244.5841 - Facsimile

466195-00**FEDERAL EXPRESS**

August 2, 2005

Mr. Jim Tompkins (PM 25)
Registration Division
Office of Pesticide Programs
U.S. Environmental Protection Agency
Crystal Mall 2, Room 266A
1801 S. Bell Street
Arlington, VA 22202

RE: Triclopyr TGA 42750-REG
Initial application

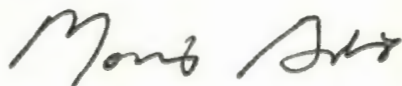
Dear Mr. Tompkins,

The enclosed submission is Albaugh's initial application to register the above referenced product. Because DowAgroscience, the basic triclopyr registrant, has no formal acid technical registration, Albaugh requests that the Agency consider this application a "me too" of Micro Flo Company's Triclopyr Acid Technical (EPA Reg. No. 51036-386) even though it is Albaugh's understanding that registration may have been cancelled. *transferred, now 62719-533*

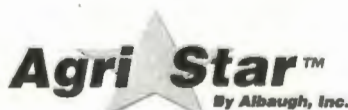
Documents and studies to support this application are listed on the enclosed transmittal page.

Please call if you have any questions.

Regards,



Morris Gaskins
Registrations Manager
Albaugh, Inc.
229-244-3288



PREMIER SUPPLIER OF OFF-PATENT CROP PROTECTION PRODUCTS
www.albaughinc.com

TRANSMITTAL DOCUMENT

Name and address of submitter:

Albaugh, Inc.
P.O. Box 2127
Valdosta, GA 31604-2127

Company Official: Morris Gaskins

Telephone: (229) 244-3288

Regulatory action for which this package is submitted:

Initial application to register Triclopyr TGA1

Transmittal Date: August 2, 2005

List of items submitted:

- Transmittal page
- Cover letter
- 8570-1 application form
- 8570-34 Certification With Respect to Citation of Data form
- 8570-35 Data Matrix (internal use copy)
- 8570-35 Data Matrix (public file copy)
- Draft label (5 copies)
- Basic CSF (2 copies)

46619501 • Summary of OPPTS 830.1000 Series Product Properties Test Guidelines (3 copies)

46619502 • Series 830-A Preliminary Analysis and Enforcement Analytical Methods (OPPTS Guidelines 830.1700 and 830.1800) (3 copies)

46619503 • Series 830-A Product Identity and Composition, Description of Materials Used to Produce the Product, Description of Production Process, Discussion of Formation of Impurities and Certified Limits (OPPTS Guidelines 830.1550, 830.1600, 830.1620, 830.1670 and 830.1750) (3 copies)

46619504 • Series 830-B Physical and Chemical Characteristics (OPPTS Guidelines 830.6302, 830.6303, 830.6304, 830.6313, 830.6314, 830.6315, 830.6319, 830.7000, 830.7050, 830.7100, 830.7220, 830.7370, 830.7200, 830.7840, 830.7300) (3 copies)

46619505 • Series 830-B Physical and Chemical Characteristics (OPPTS Guideline 830.7950) (3 copies)

Determination of Vapour Pressure

46619506 • **n-Octanol/Water Partition Coefficient -
Shake Flask method**



United States
Environmental Protection Agency
Washington, DC 20460

☒ Registration
☐ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 42750- XX REG	2. EPA Product Manager J. Tompkins	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Triclopyr TGA1	PM# 25	
5. Name and Address of Applicant (Include ZIP Code) Albaugh, Inc. P.O. Box 2127 Valdosta, GA 31604-2127 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. 51036-386 Product Name Triclopyr Acid Technical	

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input checked="" type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

This application is being submitted under the PRIA Fee for Service program as a Class R31 New Product, Non-Fast Track application.

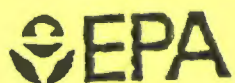
Accordingly, registrant believes the appropriate fee for this application is \$4,000 with an 8 month decision timeline
Please forward invoice to 1-229-244-5841 (fax) and/or e-mail to morrisg@albaughinc.com

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 2.5 gal, 30 gal, bulk		5. Location of Label Directions <input checked="" type="checkbox"/> On label attached to container	
6. Manner in Which Label is Affixed to Product		<input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled <input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Morris Gaskins		Title Registrations Manager	
		Telephone No. (Include Area Code) 229-244-3288	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamp)
2. Signature 		3. Title Registrations Manager	
4. Typed Name Morris Gaskins		5. Date 8/2/05	



ADMINISTRATIVE NO(S):: 42750 - REG

PM: 25

CHEMICAL NO.: _____

The jacket for this action can be
requested through the JACKETS system.

62719-533

Tobi

MEMORANDUM

DATE: 8/11/05

42750-REG

TO: Jim Tompkins (25), Regulatory Manager

FROM: Information Services Branch, IRSD

Your receipt of this data submission is not an indication that MRIDs for the enclosed studies have been posted in OPPIN.

We expect that it will be approximately 5 days from the above date before the study-level data is available in OPPIN.

If you have any questions about this process, please contact Maureen Sherrill (305-5361) or Teresa Downs (305-5363).

This is a: ☒ fully accepted submission
☐ partially accepted submission
☐ rejected submission



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

August 10, 2005

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

ALBAUGH INC
PO Box 2127
VALDOSTA, GA 31604-2127

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 04-AUG-05. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

Receipt for Section 3

S: 782668

Regulatory Type: Product Registration - Section 3

Resubmission: ☐ Yes ☒ No

Application Type: New Registration

Fee For Service: ☒ Yes ☐ No

Company: 42750 ALBAUGH INC

V

Risk Manager: Registration Division, Risk Management Team 25

Product #: 42750-REG Product Name: TRICLOPYR TGA

Over/Under:

Me Too Section3: Me Too Product Name:

Application Date: 02-Aug-2005

OPP Rec'd Date: 04-Aug-2005

Front End Date: 05-Aug-2005

Risk Manager Send Date:

FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Fast Track: ☐

New Ingredient: ☐

Receipt Description:

New product, non fast track application.

New Ingredient Request Date:

New Ingredient Received Date:

Form A: ☐ Signature Date:

Form B: ☐ Signature Date:

Print Letter

Enter More Information

Receipt Content

Study

CORPORATE OFFICE

1525 NE 36th Street
Ankeny, IA 50021
515.964.9444 - Office
800.247.8013 - Toll Free
515.964.7813 - Facsimile

ALBAUGH, INC.**Valdosta Office**

P.O. Box 2127
304 Janet Street, Suite H
Valdosta, GA 31604
229.244.3288 - Office
229.244.5841 - Facsimile

488195-00**FEDERAL EXPRESS**

August 2, 2005

Mr. Jim Tompkins (PM 25)
Registration Division
Office of Pesticide Programs
U.S. Environmental Protection Agency
Crystal Mall 2, Room 266A
1801 S. Bell Street
Arlington, VA 22202

RE: Triclopyr TGA
Initial application

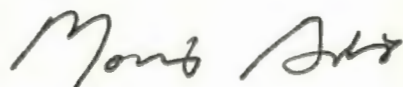
Dear Mr. Tompkins,

The enclosed submission is Albaugh's initial application to register the above referenced product. Because DowAgroscience, the basic triclopyr registrant, has no formal acid technical registration, Albaugh requests that the Agency consider this application a "me too" of Micro Flo Company's Triclopyr Acid Technical (EPA Reg. No. 51036-386) even though it is Albaugh's understanding that registration may have been cancelled.

Documents and studies to support this application are listed on the enclosed transmittal page.

Please call if you have any questions.

Regards,



Morris Gaskins
Registrations Manager
Albaugh, Inc.
229-244-3288

Agri Star™
By Albaugh, Inc.

PREMIER SUPPLIER OF OFF-PATENT CROP PROTECTION PRODUCTS
www.albaughinc.com

TRANSMITTAL DOCUMENT

Name and address of submitter:

Albaugh, Inc.
P.O. Box 2127
Valdosta, GA 31604-2127

Company Official: Morris Gaskins

Telephone: (229) 244-3288

Regulatory action for which this package is submitted:

Initial application to register Triclopyr TGA1

Transmittal Date: August 2, 2005

List of items submitted:

- Transmittal page
- Cover letter
- 8570-1 application form
- 8570-34 Certification With Respect to Citation of Data form
- 8570-35 Data Matrix (internal use copy)
- 8570-35 Data Matrix (public file copy)
- Draft label (5 copies)
- Basic CSF (2 copies)

46619501 • Summary of OPPTS 830.1000 Series Product Properties Test Guidelines (3 copies)

46619502 • Series 830-A Preliminary Analysis and Enforcement Analytical Methods (OPPTS Guidelines 830.1700 and 830.1800) (3 copies)

46619503 • Series 830-A Product Identity and Composition, Description of Materials Used to Produce the Product, Description of Production Process, Discussion of Formation of Impurities and Certified Limits (OPPTS Guidelines 830.1550, 830.1600, 830.1620, 830.1670 and 830.1750) (3 copies)

46619504 • Series 830-B Physical and Chemical Characteristics (OPPTS Guidelines 830.6302, 830.6303, 830.6304, 830.6313, 830.6314, 830.6315, 830.6319, 830.7000, 830.7050, 830.7100, 830.7220, 830.7370, 830.7200, 830.7840, 830.7300) (3 copies)

46619505 • Series 830-B Physical and Chemical Characteristics (OPPTS Guideline 830.7950) (3 copies)

Determination of Vapour Pressure

46619506 • **n-Octanol/Water Partition Coefficient -
Shake Flask method**

FEE FOR SERVICE



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

August 8, 2005

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

PLEASE RETURN A COPY OF THIS LETTER WITH PAYMENT

OPP Decision Number: **D-359509**
EPA File Symbol or Registration Number: **42750-REG**
Product Name: **TRICLOPYR TGAI**
EPA Receipt Date: 04-Aug-2005
EPA Company Number: 42750
Company Name: ALBAUGH INC

MORRIS GASKINS
ALBAUGH, INC
ALBAUGH INC
PO Box 2127
VALDOSTA, GA 31604-2127

SUBJECT: Receipt of Registration Application Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has received your application for registration. If you submitted data with this application, the results of the PRN-86-5 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: **R31**

NEW PRODUCT;NON-FAST TRACK (INCLUDES REVIEWS OF PRODUCT CHEMISTRY;
ACUTE TOXICITY; PUBLIC HEALTH PEST EFFICACY);

Please remit payment in the amount of: **\$ 4,000** to:

By USPS:
USEPA Washington Finance Center
Pesticide Registration Service Fee
PO Box 360277
Pittsburgh, PA 15251

By Courier:

U.S. EPA Washington Finance Center
Pesticide Registration Service Fee
C/O Mellon Client Service Center
500 Ross Street, Room 670
Box 360277
Pittsburgh, PA 15251-6277
Attn: EPA Module Supervisor
Telephone: (412) 236-2294

All payments must be in United States currency by check, bank draft, or money order drawn to the order of the Environmental Protection Agency. To ensure proper credit, please write the OPP DECISION NUMBER on your check, and enclose a copy of this letter with your payment.

You may be eligible for a full or partial waiver of the registration service fee if, for example, you qualify as a small business or are applying for a minor use, or if your application is solely associated with an IR-4 tolerance petition. Please be advised that if you intend to request a waiver, you must do so in writing within 15 days of receipt of this invoice instead of remitting the amount indicated above. OPP will not consider waiver requests after the registration service fee has been paid. Information regarding eligibility and how to request and document a fee waiver is available on the OPP Fee for Service web site at www.epa.gov/pesticides/fees.

Please send Registration Service Fee Waiver requests to:

By USPS:

Document Processing Desk (WAIVER)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
1200 Pennsylvania Ave NW
Washington, DC 20460

By Courier:

Document Processing Desk (WAIVER)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Room 266A, Crystal Mall #2
1801 S. Bell St.
Arlington, VA 22202

A PRIA decision time review period will not start until a fee waiver is granted and/or the Agency receives certification that the outstanding fee has been paid. If the Agency does not receive certification of payment for this action or a fee waiver request within the next 45 days, the Agency will presume that you no longer want to pursue this action. The Agency will then initiate a process that may result in administrative withdrawal of this action.

If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman at (703) 305-6249.

Sincerely,



Front End Processing Staff
Information Technology & Resources Management Division

Fee for Service



This package includes the following

- ☒ New Registration
- ☐ Amendment

- ☒ Studies? ☐ Fee Waiver?
- ☐ volpay % Reduction: ____

for Division

- ☐ AD
- ☐ BPPD
- ☒ RD

Risk Mgr. 25

Receipt No.

S-

782666

EPA File Symbol/Reg. No.

42750-REG

Pin-Punch Date:

8/4/05

☐ This item is NOT subject to FFS action.

Action Code:

Requested:

R-31

Granted:

R-31

Amount Due: \$ 4,000⁰⁰

Parent/Child Decisions:

Reviewer: J. Miller

Date: 8-8-05

Remarks:

TRB: They have not included the MSDS's of the starting materials which should be submitted to TRB with the date. 8/8/05 D.K.

Unregistered source of AI, going cite-all.

Receipt for Section 3					
S:	782666	Resubmission:	<input type="radio"/> Yes <input checked="" type="radio"/> No	<div>Print Letter</div> <div>Enter More Information</div> <div>Tracking</div>	
Regulatory Type:	Product Registration - Section 3	Fee For Service:	<input checked="" type="radio"/> Yes <input type="radio"/> No		
Application Type:	New Registration	Billable:	<input type="radio"/> Yes <input checked="" type="radio"/> No		
Company:	42750 ALBAUGH INC		V		
Risk Manager:	Registration Division, Risk Management Team 25				
Product #:	42750-REG	Product Name:	TRICLOPYR TGAI		
Overlaid:					
Me Too Section3:		Me Too Product Name:			
Application Date:	02-Aug-2005	OPP Rec'd Date:	04-Aug-2005	<div>Receipt Content</div> <div>Study</div>	
Front End Date:	05-Aug-2005	Risk Manager Send Date:	08-Aug-2005		
FFS Due Date:		Negotiated Due Date:			
OPP Target Date:					
Fast Track:	<input type="checkbox"/>	New Ingredient:	<input type="checkbox"/>		
Receipt Description:					
New product, non fast track application. 8/8/05, R31 Invoice (LVV).		New Ingredient Request Date: <input type="text"/>			
		New Ingredient Received Date: <input type="text"/>			
Form A:	<input type="checkbox"/>	Signature Date:	<input type="text"/>	Form B:	<input type="checkbox"/>
		Signature Date: <input type="text"/>			

TRANSMITTAL DOCUMENT

Name and address of submitter:

Albaugh, Inc.
P.O. Box 2127
Valdosta, GA 31604-2127

Company Official: Morris Gaskins

Telephone: (229) 244-3288

Regulatory action for which this package is submitted:

Initial application to register Triclopyr TGA1

Transmittal Date: August 2, 2005

List of items submitted:

- Transmittal page
- Cover letter
- 8570-1 application form
- 8570-34 Certification With Respect to Citation of Data form
- 8570-35 Data Matrix (internal use copy)
- 8570-35 Data Matrix (public file copy)
- Draft label (5 copies)
- Basic CSF (2 copies)
- Summary of OPPTS 830.1000 Series Product Properties Test Guidelines (3 copies)
- Series 830-A Preliminary Analysis and Enforcement Analytical Methods (OPPTS Guidelines 830.1700 and 830.1800) (3 copies)
- Series 830-A Product Identity and Composition, Description of Materials Used to Produce the Product, Description of Production Process, Discussion of Formation of Impurities and Certified Limits (OPPTS Guidelines 830.1550, 830.1600, 830.1620, 830.1670 and 830.1750) (3 copies)
- Series 830-B Physical and Chemical Characteristics (OPPTS Guidelines 830.6302, 830.6303, 830.6304, 830.6313, 830.6314, 830.6315, 830.6319, 830.7000, 830.7050, 830.7100, 830.7220, 830.7370, 830.7200, 830.7840, 830.7300) (3 copies)
- Series 830-B Physical and Chemical Characteristics (OPPTS Guideline 830.7950) (3 copies)

CORPORATE OFFICE

1525 NE 36th Street
Ankeny, IA 50021
515.964.9444 - Office
800.247.8013 - Toll Free
515.964.7813 - Facsimile

ALBAUGH, INC.

FEDERAL EXPRESS

Valdosta Office

P.O. Box 2127
304 Janet Street, Suite H
Valdosta, GA 31604
229.244.3288 - Office
229.244.5841 - Facsimile

August 2, 2005

Mr. Jim Tompkins (PM 25)
Registration Division
Office of Pesticide Programs
U.S. Environmental Protection Agency
Crystal Mall 2, Room 266A
1801 S. Bell Street
Arlington, VA 22202

RE: Triclopyr TGA
Initial application

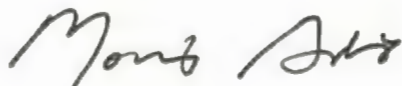
Dear Mr. Tompkins,

The enclosed submission is Albaugh's initial application to register the above referenced product. Because DowAgroscience, the basic triclopyr registrant, has no formal acid technical registration, Albaugh requests that the Agency consider this application a "me too" of Micro Flo Company's Triclopyr Acid Technical (EPA Reg. No. 51036-386) even though it is Albaugh's understanding that registration may have been cancelled. 62719-533

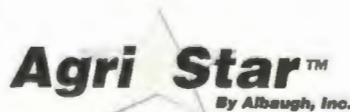
Documents and studies to support this application are listed on the enclosed transmittal page.

Please call if you have any questions.

Regards,



Morris Gaskins
Registrations Manager
Albaugh, Inc.
229-244-3288



PREMIER SUPPLIER OF OFF-PATENT CROP PROTECTION PRODUCTS
www.albaughinc.com



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460.

Do not send the completed form to this address.

Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number
 Vaughn, Inc. P.O. Box 2127 Valdosta, GA 31604

EPA Registration Number/File Symbol
 42750-xx

Active Ingredient(s) and/or representative test compound(s)
 Triclopyr acid

Date
 8/2/05

General Use Patterns (list all those claimed for this product using 40 CFR Part 158)
 pasture, rangeland, terrestrial non-food

Product Name
 Triclopyr TGA1

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

☒ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

☐ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature

Morris Gaskins

Date

8/2/05

Typed or Printed Name and Title

Morris Gaskins Registrations Manager

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, DC 20460

Form Approved OMB No. 2070-0060



Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137) U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date: 8/2/05	EPA Reg. No./File Symbol 42750-appl	Page 1 of 5
Applicant's/Registrant's Name & Address: Albaugh Inc. 121 NE 18 th St. Ankeny, IA 50021	Product: TRICLOPYR TGAI	

Ingredient: Triclopyr acid CAS # 55335-06-3

Guideline Reference	Guideline Study Name	MRID Number	Submitter	Status	Note
830.1550	Product Identity and Composition	With application	Albaugh	OWN	
830.1600	Description of Materials Used to Produce the	With application	Albaugh	OWN	
830.1620	Description of Product Process	With application	Albaugh	OWN	
830.1650	Description of Formulation Process				Waiver ²
830.1670	Description of Formation of Impurities	With application	Albaugh	OWN	
830.1700	Preliminary Analysis	With application	Albaugh	OWN	
830.1750	Certified Limits	With application	Albaugh	OWN	
830.1800	Enforcement Analytical Method	With application	Albaugh	OWN	
830.6302	Color	With application	Albaugh	OWN	
830.6303	Physical State	With application	Albaugh	OWN	
830.6304	Odor	With application	Albaugh	OWN	
830.6313	Stability to Normal and Elevated Temperatures, Metals, and Metal Ions	With application	Albaugh	OWN	
830.6314	Oxidation/Reduction: Chemical Incompatibility				Not req'd ¹
830.6315	Flammability				Not req'd ¹
830.6316	Explosibility				Not req'd ¹
830.6317	Storage Stability				Not req'd ¹

Signature 	Name and Title: Morris Gaskins Registrations Manager	Date 8/2/05
----------------------	--	-----------------------

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, DC 20460

Form Approved OMB No. 2070-0060



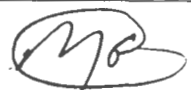
Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137) U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date: 8/2/05	EPA Reg. No./File Symbol 42750-appl	Page 2 of 5
Applicant's/Registrant's Name & Address: Albaugh Inc. 121 NE 18 th St. Ankeny, IA 50021	Product: TRICLOPYR TGAI	

Ingredient: Triclopyr acid CAS # 55335-06-3

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6319	Miscibility				Not req'd ¹
830.6320	Corrosion Characteristics				Not req'd ¹
830.6321	Dielectric Breakdown Voltage				Not req'd ¹
830.7000	pH	With application	Albaugh	OWN	
830.7050	UV/Visible Absorption	With application	Albaugh	OWN	
830.7100	Viscosity				Not req'd ¹
830.7200	Melting Point/Melting Range	With application	Albaugh	OWN	
830.7220	Boiling Point/Boiling Range				Waiver ³
830.7300	Density/Relative Density/Bulk Density	With application	Albaugh	OWN	
830.7370	Dissociation Constants in Water	With application	Albaugh	OWN	
830.7550	Partition Coefficient (n-octanol/water), Shake Flask Method				Waiver ⁴
830.7560	Partition Coefficient (n-octanol/water), Generator Column Method				Waiver ⁴
830.7570	Partition Coefficient (n-octanol/water), Estimation by Liquid Chromatography	With application	Albaugh	OWN	

Signature 	Name and Title: Morris Gaskins Registrations Manager	Date: 8/2/05
---	---	--------------

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, DC 20460

Form Approved OMB No. 2070-0060




Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137) U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date: 8/2/05	EPA Reg. No./File Symbol 42750-appl	Page 3 of 5
Applicant's/Registrant's Name & Address: Albaugh Inc. 121 NE 18 th St. Ankeny, IA 50021	Product: TRICLOPYR TGAI	

Ingredient: Triclopyr acid CAS # 55335-06-3

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7840	Water Solubility: Column Elution Method; Shake Flask Method	With application	Albaugh	OWN	
830.7860	Water Solubility, Generator Column Method				Waiver ⁵
830.7950	Vapor Pressure	With application	Albaugh	OWN	
870.1100	Acute Oral Toxicity - Rat	CITE ALL		PAY	
870.1200	Acute Dermal Toxicity - Rat	CITE ALL		PAY	
870.1300	Acute Inhalation Toxicity - Rat	CITE ALL		PAY	
870.2400	Primary Eye Irritation - Rabbit	CITE ALL		PAY	
870.2500	Primary Dermal Irritation	CITE ALL		PAY	
870.2600	Dermal Sensitization	CITE ALL		PAY	

Signature 	Name and Title: Morris Gaskins Registrations Manager	Date 8/2/05
---	---	----------------


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, DC 20460

Form Approved OMB No. 2070-0060



Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137) U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date: 8/2/05		EPA Reg. No./File Symbol 42750-appl		Page 4 of 5	
Applicant's/Registrant's Name & Address: Albaugh Inc. 121 NE 18 th St. Ankeny, IA 50021		Product: TRICLOPYR TGAI			
Ingredient: Triclopyr acid CAS # 55335-06-3					
Guideline Reference Number	Guideline Study Name	MRID	Submitter (EPA Co. No.)	Status	Note
Triclopyr data requirements					
Albaugh will make offers-to-pay to the following companies that appear on the current data submitters list for triclopyr acid.					
Triclopyr Generic Data	Cite-All		Nufarm Americas (228)	PAY	
Triclopyr Generic Data	Cite-All		Dow Chemical (464)	PAY	
Triclopyr Generic Data	Cite-All		DuPont (1812)	PAY	
Triclopyr Generic Data	Cite-All		Micro Flo Co. (51036)	PAY	
Triclopyr Generic Data	Cite-All		Dow Agrosience (62719)	PAY	
Triclopyr Generic Data	Cite-All		SDTF (66607)	PAY	
Triclopyr Generic Data	Cite-All		ORETF (71754)	PAY	
Triclopyr Generic Data	Cite-All		Ag Re-entry TF (71755)	PAY	
Triclopyr Generic Data	Cite-All		Nations Ag II (72167)	PAY	
Triclopyr Generic Data	Cite-All		UPM Corp. (72680)	PAY	
Triclopyr Generic Data	Cite-All		AHETF (75234)	PAY	
Signature 			Name and Title: Morris Gaskins Registrations Manager		Date 8/2/05

099

0405

Footnote 1

- 830.6314 Oxidation/Reduction: chemical incompatibility
- 830.6315 Flammability
- 830.6316 Explodability
- 830.6317 Storage Stability
- 830.6319 Miscibility
- 830.6320 Corrosion Characteristics
- 830.6321 Dielectric Breakdown
- 830.7100 Viscosity

This data is not required for Technical Grade products per Product Properties Test Guidelines OPPTS 830.1000 (e)(2)(xi)(B) Table 2

Footnote 2

- 830.6350 Formulation Process

Albaugh requests a waiver for this data requirement. TRICLOPYR TGAI product is not deliberately formulated. See Guideline 830.1620.

Footnote 3

- 830.7220 Boiling Point/Range

Albaugh requests a waiver for this data requirement. Triclopyr acid technical is a solid.

Footnote 4

- 830.7550 Partition Coefficient, Shake Flask Method
- 830.7560 Partition Coefficient, Generator Column Method

Albaugh requests a waiver for these data requirements. Albaugh has elected to satisfy this data with the 830.7570 Liquid Chromatography Method.

Footnote 5

- 830.7860 Water Solubility, Generator Column Method

Albaugh requests a waiver for these data requirements. Albaugh has elected to satisfy this data with the 830.7840 Shake Flask Method.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, DC 20460

Form Approved OMB No. 2070-0060

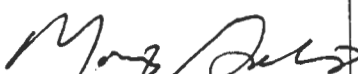
Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137) U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date: 8/2/05	EPA Reg. No./File Symbol 42750-appl	Page 1 of 5
Applicant's/Registrant's Name & Address: Albaugh Inc. 121 NE 18 th St. Ankeny, IA 50021	Product: TRICLOPYR TGAI	

Ingredient: Triclopyr acid CAS # 55335-06-3

Guideline Reference	Guideline Study Name	MRID Number	Submitter	Status	Note
			Albaugh	OWN	
			Albaugh	OWN	
			Albaugh	OWN	
					Waiver ²
			Albaugh	OWN	
			Albaugh	OWN	
			Albaugh	OWN	
			Albaugh	OWN	
			Albaugh	OWN	
			Albaugh	OWN	
			Albaugh	OWN	
			Albaugh	OWN	
					Not req'd ¹
					Not req'd ¹

Signature: 	Name and Title: Morris Gaskins Registrations Manager	Date: 8/2/05
---	---	--------------

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, DC 20460

Form Approved OMB No. 2070-0060

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137) U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date: 8/2/05	EPA Reg. No./File Symbol 42750-appl	Page 2 of 5
Applicant's/Registrant's Name & Address: Albaugh Inc. 121 NE 18 th St. Ankeny, IA 50021	Product: TRICLOPYR TGAI	

Ingredient: Triclopyr acid CAS # 55335-06-3

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
					Not req'd ¹
					Not req'd ¹
					Not req'd ¹
			Albaugh	OWN	
			Albaugh	OWN	
					Not req'd ¹
			Albaugh	OWN	
					Waiver ³
			Albaugh	OWN	
			Albaugh	OWN	
					Waiver ⁴
		Waiver ⁴			
		Albaugh	OWN		
Signature	Name and Title: Morris Gaskins Registrations Manager			Date 8/2/05	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, DC 20460

Form Approved OMB No. 2070-0060

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137) U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date: 8/2/05	EPA Reg. No./File Symbol 42750-appl	Page 3 of 5
Applicant's/Registrant's Name & Address: Albaugh Inc. 121 NE 18 th St. Ankeny, IA 50021	Product: TRICLOPYR TGAI	

Ingredient: Triclopyr acid CAS # 55335-06-3

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Albaugh	OWN	
					Waiver ⁵
			Albaugh	OWN	
				PAY	
				PAY	
				PAY	
				PAY	
				PAY	
				PAY	

Signature	Name and Title: Morris Gaskins Registrations Manager	Date 8/2/05
-----------	---	-------------

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, DC 20460


Form Approved OMB No. 2070-0060

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137) U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date: 8/2/05	EPA Reg. No./File Symbol 42750-appl	Page 4 of 5
Applicant's/Registrant's Name & Address: Albaugh Inc. 121 NE 18 th St. Ankeny, IA 50021	Product: TRICLOPYR TGAI	

Ingredient: Triclopyr acid CAS # 55335-06-3

Guideline Reference Number	Guideline Study Name	MRID	Submitter (EPA Co. No.)	Status	Note
			Nufarm Americas (228)	PAY	
			Dow Chemical (464)	PAY	
			DuPont (1812)	PAY	
			Micro Flo Co. (51036)	PAY	
			Dow Agroscience (62719)	PAY	
			SDTF (66607)	PAY	
			ORETF (71754)	PAY	
			Ag Re-entry TF (71755)	PAY	
			Nations Ag II (72167)	PAY	
Signature			Name and Title: Morris Gaskins Registrations Manager		Date 8/2/05



Footnote 1

- 830.6314 Oxidation/Reduction: chemical incompatibility
- 830.6315 Flammability
- 830.6316 Explodability
- 830.6317 Storage Stability
- 830.6319 Miscibility
- 830.6320 Corrosion Characteristics
- 830.6321 Dielectric Breakdown
- 830.7100 Viscosity

This data is not required for Technical Grade products per Product Properties Test Guidelines OPPTS 830.1000 (e)(2)(xi)(B) Table 2

Footnote 2

- 830.6350 Formulation Process

Albaugh requests a waiver for this data requirement. TRICLOPYR TGAI product is not deliberately formulated. See Guideline 830.1620.

Footnote 3

- 830.7220 Boiling Point/Range

Albaugh requests a waiver for this data requirement. Triclopyr acid technical is a solid.

Footnote 4

- 830.7550 Partition Coefficient, Shake Flask Method
- 830.7560 Partition Coefficient, Generator Column Method

Albaugh requests a waiver for these data requirements. Albaugh has elected to satisfy this data with the 830.7570 Liquid Chromatography Method.

Footnote 5

- 830.7860 Water Solubility, Generator Column Method

Albaugh requests a waiver for these data requirements. Albaugh has elected to satisfy this data with the 830.7840 Shake Flask Method.

TRICLOPYR TGAI
An Herbicide for Manufacturing Use Only

ACTIVE INGREDIENT:	
3,5,6-trichloro-2-pyridyloxyacetic acid	98.0%
INERT INGREDIENTS:	2.0%
TOTAL:	100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID

IF SWALLOWED:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by the poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or doctor for treatment advice.

IF IN EYES:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
- Call a poison control center or doctor for treatment advice.

EPA Reg. No. 42750-xx

EPA Est. No. XXX-XX-XXX

NET CONTENTS:

Manufactured For:
ALBAUGH, INC.
ANKENY, IA 50021

PRECAUTIONARY STATEMENTS,

Hazards to Humans and Domestic Animals

CAUTION. Harmful if swallowed or absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling. Remove and wash contaminated clothing before reuse.

EMERGENCY NUMBERS: Transportation or spill, call CHEMTREC 800-424-9300.

ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with a National Pollution Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

NOTICE: Read the entire label. Use only according to label directions. Before buying or using this product, read WARRANTY LIMITATIONS AND DISCLAIMER elsewhere on this label.

AGRICULTURAL CHEMICAL - Do not ship or store with food, feeds, drugs or clothing

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

This product may be used to manufacture products that:

1. Contain triclopyr butoxyethyl ester (BEE) for use on rangeland, permanent pastures, forestry, turf, non-irrigation ditches, non-cropland, roadsides, rights-of-ways, fence rows, industrial sites and conservation reserve program (CRP) areas.
2. Contain triclopyr triethanolamine (TEA) for use on rangeland, permanent pastures, forestry, turf, Christmas tree plantations, non-irrigation ditches, non-cropland, roadsides, rights-of-ways, rice, fencerows, industrial sites and conservation reserve program (CRP) areas.
3. Specific uses not listed on the MP label if the formulator, user group or grower has complied with the U.S. EPA submission requirements regarding the support of such uses.

NOTE: Because of their properties and intended uses, formulations containing TRICLOPYR 98% TECHNICAL ACID may require precautionary labeling differing from that given on this label. Formulators should develop their own use and precautionary labeling based on the properties and intended uses of their own formulations and in accordance with all pertinent laws and regulations.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited.

PESTICIDE STORAGE: Store above 28 F away from moisture.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes "cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

GENERAL: Consult Federal, state or local disposal authorities for approved alternative procedures.

WARRANTY LIMITATIONS AND DISCLAIMER

Albaugh, Inc. warrants that at the time of delivery, the good will conform to its chemical description on the label, that they will pass without objection in the trade under the contract description, that they will be reasonably fit for the uses stated on the label when used in accordance with directions, that Seller will convey good title thereto, and that such goods will be delivered free from any lawful security interest, lien or encumbrance.

This is the only warranty made on this product. ALBAUGH, INC. EXPRESSLY DISCLAIMS ANY IMPLIED WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE AND, EXCEPT AS SET FORTH IN THE ABOVE PARAGRAPH, ANY OTHER EXPRESS OR IMPLIED WARRANTIES. Buyer acknowledges the use of its own independent skill and expertise in the selection and use of the goods and does not rely exclusively on any oral or written statements or representations.

